

Pipeline and Hazardous Materials Safety Administration

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED [7007 2560 0000 7825 9471]

September 21, 2010

Mr. Greg Mattson VP, HSSE & Engineering BP Exploration (Alaska), Inc. P.O. Box 196612 Anchorage, AK 99519-6612

CPF 5-2010-5024M

Dear Mr. Mattson:

On July 27-29, 2010, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected BP Exploration Alaska's (BPXA) procedures for the Badami Sales Oil Pipeline in Prudhoe Bay, Alaska.

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within BPXA plans or procedures, as described below:

- 1. §195.589 What corrosion control information do I have to maintain?
 - (a) You must maintain current records or maps to show the location of-
 - (1) Cathodically protected pipelines;
 - (2) Cathodic protection facilities, including galvanic anodes, installed after January 28, 2002; and
 - (3) Neighboring structures bonded to cathodic protection systems.

The Operator's maps and records did not indicate locations of all the insulation flanges.

- 2. §195.404(a)(4) Maps and Records.
 - a) Each operator shall maintain current maps and records of its pipeline

systems that include at least the following information;

(4) The diameter, grade, type and nominal wall thickness of all pipe.

The Pipeline alignment sheets (P244) indicated that the pipe wall thickness was .281 inches on sheet 29, 46, and 47(below ground river crossings). These sheets should indicate the correct wall thickness.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 90 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

In correspondence concerning this matter, please refer to CPF 5-2010-5024M and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,
Dennis Whinnal

Dennis Hinnah

Deputy Director, Western Region

Pipeline and Hazardous Materials Safety Administration

Enclosure: Response Options for Pipeline Operators in Compliance Proceedings

cc: PHP-60 Compliance Registry

B. Flanders (#130730)